

IWONA PORTALATIN,)	
)	
Plaintiff,)	
)	
v.)	No. 1:14-cv-08271
)	
BLATT, HASENMILLER, LEIBSKER &)	Judge Matthew F. Kennelly
MOORE, LLC and MIDLAND FUNDING,)	
LLC,)	
)	
Defendants.)	

NOW COMES Defendant Blatt, Hasenmiller, Leibsker & Moore, LLC (“BHLM”), by its undersigned counsel, and pursuant to Fed.R.Civ.P. 15(a)(2), moves the Court for leave to amend its affirmative defenses to assert the additional affirmative defense of satisfaction, pursuant to Fed.R.Civ.P. 8(c)(1), for the reasons more fully set forth in Defendant’s Motion to Dismiss (Dkt. 91, filed under seal) and incorporated herein by reference.

WHEREFORE, BHLM respectfully requests that the Court enter an order granting Defendant leave to amend its affirmative defenses, as well as entering such further relief as is just, necessary and proper.

Respectfully Submitted,

By: /s/David L. Hartsell
One of Its Attorneys

David L. Hartsell
Helen D. Arnold
McGUIREWOODS LLP
77 W. Wacker Drive, Suite 4100

Chicago, Illinois 60601-1818
(312) 849-8100
(312) 849-3690 (fax)
dhartsell@mcguirewoods.com
harnold@mcguirewoods.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **DEFENDANT'S MOTION FOR LEAVE TO AMEND AFFIRMATIVE DEFENSES** was electronically filed with the Clerk of the Court using the CM/ECF system on November 20, 2015, which constitutes service on below counsel who are registered electronic filing users, pursuant to FED. R. CIV. P. 5(b)(2)(D) and L.R. 5.9:

Mohammed O. Badwan
Ahmad Tayseer Sulaiman
Daniel J. McGarry
Ross M. Zambon
Sulaiman Law Group, Ltd.
mbadwan@sulaimanlaw.com
ahmad.sulaiman@sulaimanlaw.com
dmcgarry@sulaimanlaw.com
rzambon@sulaimanlaw.com

Nicholas H. Wooten
Nick Wooten, LLC
nick@nickwooten.com

Majdi Y. Hijazin
Law Offices of Majdi Y. Hijazin, Ltd.
mhijazin@hijazinlaw.com

David M. Schultz
Katherine H. Tresley
Hinshaw & Culbertson
dschultz@hinshawlaw.com
ktresley@hinshawlaw.com

/s/David L Hartsell _____